

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, INC.,

Plaintiff,

v.

AMAZON WEB SERVICES, LLC,
AMAZON.COM, INC.,
ALEXA INTERNET, INC.,
IAC SEARCH & MEDIA, INC.,
SNAP TECHNOLOGIES INC.,
YAHOO! INC.,
SMARTDEVIL INC.,
EXALEAD INC., AND
EXALEAD SA.,

Defendants.

C.A. No. 07-787-SLR

**PLAINTIFF GIRAFA.COM, INC.'S
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Girafa.com, Inc. (“Girafa” or “Plaintiff”) hereby respectfully moves, pursuant to 35 U.S.C. § 283 and Fed. R. Civ. P. 65, for the entry of a preliminary injunction against Defendants Smartdevil, Inc. (“Smartdevil”), Snap Technologies, Inc. (“Snap”), Alexa Internet, Inc. (“Alexa”), Amazon Web Services, LLC. (“AWS”) and Amazon.com, Inc. (“Amazon”) (collectively referred to as the “PI Defendants”), all of whom use Girafa’s patented technology.¹

In particular, Girafa requests that this Court enjoin the PI Defendants from directly and indirectly infringing the ‘904 patent, and specifically enjoin the PI Defendants from: (1) providing its customers with access to thumbnails stored on its image servers and the software

¹ This motion is limited to only those defendants that directly compete with Girafa in a manner that erodes Girafa’s market share. Thus this motion does not apply to Defendants IAC Search & Media, Inc., Yahoo! Inc., Exalead Inc., and Exalead SA., because Girafa has no information that these defendants are currently directly competing in this manner.

code to manage the display of thumbnails; and (2) displaying thumbnail images in an infringing manner.

Plaintiff's Opening Memorandum, and the supporting declarations of Shirli Ran and Dr. Brad A. Myers, are filed herewith.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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